4.1.2 Information Requiring Eligibility Verification

The chart below provides a list of eligibility criteria along with suggested sources of allowable verification. The list of sources to verify an eligibility item is not exhaustive, but provides a sampling of the possible sources.

Do not verify information that has already been verified. FEPs must verify identity, Social Security number, birth date, and citizenship only once per lifetime of the case. (See 4.1.4) FEPs must verify other eligibility criteria at every eligibility review and when new information is reported or received through a data exchange. FEPs must conduct eligibility reviews at least every 6 months. If valid verification documentation already exists via data exchange or in the Electronic Case File, the FEP must not request additional verification. For example, if a legible copy of the applicant's current lease is in the ECF, rather than pend the case for additional verification of Wisconsin residency, FEPs must use this existing documentation to verify Wisconsin residency.

The following will be added to the Verification chart located in this section of the manual:

Eligibility Criteria	Suggested Sources of Verification	ECF Code
Prepaid Debit Card	Current account statement	BNK
(do not verify closed cards)		

No change to remainder of 4.1.2

10.4.1 Electronic Funds Transfer Option

W-2 agencies are encouraged to provide money management and banking information to W-2 participants and to promote direct deposit <u>EFT</u> of W-2 <u>payments</u> benefits into a bank account <u>financial institution</u> rather than receiving the check by mail. Advantages of direct deposit, or EFT include:

- Payments are more safe and timely.
- Avoids expensive check cashing fees.
- Many banks and credit unions financial institutions offer a no-fee, no-minimum-balance checking or savings account with direct deposit EFT accounts.
- Less staff time dealing with phone calls, documentation, completion and mailing of affidavit forms associated with lost, stolen, or destroyed checks.
- Promotes work readiness many employers require that paychecks be issued electronically.

Some participants may decline the EFT option because they are chronically overdrawn and may owe fees associated with their negative balance. For these participants, money management workshops or classes may be appropriate.

The FEP should discuss various options with the participant, such as opening a limited account with a debit card only option that does not allow expenditures in excess of available funds. Participants with credit problems may still have access to a checking or savings account. Those who have "non-fraudulent" activities reported on their ChexSystems report and have been denied access to a checking account in the past may benefit from participation in a program to repair their standing with banks. Agencies should assist participants in connecting with these community resources.

Some participants may have a prepaid debit card and use this option when electing EFT. Prepaid debit cards may offer advantages such as helping build good credit and providing an option to participants with bad credit. However, some prepaid card vendors may charge excessive fees. Fees are sometimes hidden or hard to find. In addition to the monthly fee, other fees may include: initiation or activation fees, point of sale transaction fees, cash withdrawal fees, balance inquiry fees, customer service fees, bill payment fees, and/or fees to add or "load" funds. If the participant chooses EFT using a prepaid debit card, the FEP must discuss alert the participant to the potential for possible fees charged by the financial institution with the participant. All prepaid debit cards must be included when counting assets for determining financial eligibility.

If a participant has selected EFT, and, at some point after requests to have the W-2 payment "held," the FEP must end the EFT so that CARES will issue the participant's W-2 payment by check and the FEP can then put a hold on the check.

Example 1: While meeting with her FEP, Destiny asks if she can have her W-2 payments electronically deposited onto her prepaid debit card. Her FEP gives Destiny the *Electronic Funds Transfer* form and asks Destiny if she knows about the card's possible monthly fee, customer service fee, inactivity fee, or paper statement fee. Destiny says that she has only had the card for a few weeks and is not sure of all of the fees. Her FEP advises her to call the 800 number on the back of her card to ask about the fees.

Example 1: Mercedes tells her FEP that she is planning on getting a prepaid debit card so she can have electronic deposit of her W-2 payments. The FEP advises Mercedes to be aware of fees when choosing a card, including possible monthly fees, customer service fees, inactivity fees, or paper statement fees. The FEP suggests that Mercedes compare a few cards before making her choice. When Mercedes opens a prepaid debit card, she must disclose this asset to the FEP. The FEP will need to enter the prepaid debit card information on the CWW Liquid Assets page and run eligibility.

Wage Garnishment

Some participants have a garnishment order for unpaid debts or child support. Per Wisconsin Statutes Section 49.96, W-2 payments cannot be garnished; however, financial institutions must honor garnishment actions ordered by the court. Agencies must provide this information to W-2 participants who choose <u>EFT</u> direct deposit of W-2 benefits payments. If the bank financial institution garnishes the W-2 benefits payments, the FEP should advise the participant to seek legal assistance to stop the garnishment.

13.2.3.2.4 Vehicles & Assets Information

Examples of sources to verify vehicles and assets include:

- Department of Transportation;
- Register of Deeds for mortgage or debt information;
- Credit bureaus;
- Banking and other financial institutions, including prepaid debit card accounts; and
- Auto appraisers for collector vehicles.

See Chapter 4 for additional sources to verify assets.